

EXHIBIT 16

If You Bought or Leased a New Vehicle or Bought Certain Replacement Parts for a Vehicle in the U.S. Since 1995

You Could Get Money From Settlements Totaling Approximately \$1.04 Billion

A Federal Court authorized this Notice. This is not a solicitation from a lawyer.

- Please read this Notice and the Settlement Agreements available at www.AutoPartsClass.com carefully. Your legal rights may be affected whether you act or don't act. This Notice is a summary, and it is not intended to, and does not, include all the specific details of each Settlement Agreement. To obtain more specific details concerning the Settlements, please read the Settlement Agreements.
- Separate lawsuits claiming that Defendants in each lawsuit entered into unlawful agreements that artificially raised the prices of certain component parts of qualifying new vehicles (described in Question 8 below) have been settled with 56 Defendants and their affiliates ("Settling Defendants"). Previously, settlements with 23 of the Settling Defendants ("Round 1 Settlements" totaling approximately \$225 million and "Round 2 Settlements" totaling approximately \$379 million) received final Court approval. Now, additional settlements totaling approximately \$432,823,040 have been reached with 33 Settling Defendants. These Settling Defendants are called the "Round 3 Settling Defendants," and the settlements with them are called the "Round 3 Settlements." This Notice will give you details of those proposed Round 3 Settlements and your rights in these lawsuits.
- Generally, you are included in the Settlement Classes for the Round 3 Settlements if, at any time between 1995 and 2018, depending upon the component part, you: (1) bought or leased a qualifying new vehicle in the U.S. (not for resale) or (2) indirectly purchased a qualifying vehicle replacement part (not for resale). Indirectly means you bought the vehicle replacement part from someone other than the manufacturer of the part. To find out if your vehicle qualifies, go to www.AutoPartsClass.com.
- As more fully described in Question 8 below, the Round 3 Settling Defendants have agreed to pay approximately \$432,823,040 to be made available to members of the Settlement Classes who purchased or leased a qualifying new vehicle or purchased a qualifying vehicle replacement part in the District of Columbia or one or more of the following States: Arizona, Arkansas, California, Florida, Hawaii, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Oregon, Rhode Island, South Carolina, South Dakota, Tennessee, Utah, Vermont, West Virginia, and Wisconsin.
- The Round 3 Settlements also include provisions requiring the Round 3 Settling Defendants' cooperation in the ongoing litigations. With the exception of Eberspächer, Hitachi Metals, MAHLE Behr, NGK Spark Plugs, and NTN (defined in Question 3), Round 3 Settling Defendants have also agreed not to engage in the specified conduct that is the subject of the lawsuits for a period of two years from the date of entry of the final judgment.

Your Legal Rights and Options		
SUBMIT A CLAIM	The only way to get a payment. You will be able to submit a claim for payment from the Settlements in Rounds 1 through 3 (as applicable). If you already filed a claim in the Round 1 and 2 Settlements, you do not need to submit another claim for those vehicles or replacement parts.	Began November 29, 2016
EXCLUDE YOURSELF	You will not be included in the Settlement Classes for the Round 3 Settlements from which you exclude yourself. You will receive no benefits from those Round 3 Settlements, but you will keep any rights you currently have to sue these Settling Defendants about the claims in the Settlement Classes from which you exclude yourself.	July 13, 2018
DO NOTHING NOW	You will be included in the Settlement Classes for the Round 3 Settlements and are eligible to file a claim for a payment (if you qualify). You will give up your rights to sue the Round 3 Settling Defendants about the claims in these cases.	
OBJECT TO THE SETTLEMENTS AND PLAN OF ALLOCATION	If you do not exclude yourself, you can write to the Court explaining why you disagree with any of the Round 3 Settlements or the Plan of Allocation.	July 13, 2018

GO TO THE HEARING	If you submit a written objection, you may ask to speak in Court about your opinion of the Round 3 Settlements.	August 1, 2018, at 10:00 a.m.
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- These rights and options – and the deadlines to exercise them – are explained in this Notice.
- The Court in charge of these cases still has to decide whether to finally approve the Round 3 Settlements. Payments will only be made if the Court approves the Round 3 Settlements and the Plan of Allocation, and after any appeals are resolved.

What This Notice Contains

BASIC INFORMATION	4
1. WHY IS THERE A NOTICE?	4
2. WHAT ARE THESE LAWSUITS ABOUT?	4
3. WHO ARE THE ROUND 3 SETTLING DEFENDANTS?	4
4. HAVE THERE BEEN ANY OTHER SETTLEMENTS RELATED TO THIS LAWSUIT?	5
5. WHO ARE THE NON-SETTLING DEFENDANTS?	6
6. WHAT VEHICLE PARTS ARE INCLUDED?	6
7. WHY ARE THESE CLASS ACTIONS?.....	8
WHO IS INCLUDED IN THE CLASSES	9
8. HOW DO I KNOW IF I MAY BE INCLUDED IN THE ROUND 3 SETTLEMENT CLASSES?	9
9. WHO IS NOT INCLUDED IN THE SETTLEMENT CLASSES?	11
10. WHY ARE THE LAWSUITS CONTINUING IF THERE ARE SETTLEMENTS?	11
THE ROUND 3 SETTLEMENTS' BENEFITS	12
11. WHAT DO THE ROUND 3 SETTLEMENTS PROVIDE?.....	12
HOW TO GET BENEFITS	14
12. HOW DO I SUBMIT A CLAIM?.....	14
13. HOW MUCH MONEY CAN I GET?.....	14
14. WHEN WILL I GET A PAYMENT?	14
15. WHAT IS THE NON-MONETARY RELIEF?.....	15
REMAINING IN THE CLASSES.....	15
16. WHAT HAPPENS IF I REMAIN IN THE SETTLEMENT CLASSES?	15
EXCLUDING YOURSELF FROM THE SETTLEMENT CLASSES	15
17. HOW DO I GET OUT OF THE SETTLEMENT CLASSES?	15
18. IF I DON'T EXCLUDE MYSELF, CAN I SUE FOR THE SAME THING LATER?	15
19. IF I EXCLUDE MYSELF, CAN I STILL GET MONEY BENEFITS?	16
THE LAWYERS REPRESENTING YOU.....	16
20. DO I HAVE A LAWYER REPRESENTING ME?.....	16
21. HOW WILL THE LAWYERS BE PAID?	16
OBJECTING TO THE ROUND 3 SETTLEMENTS	16
22. HOW DO I OBJECT TO OR COMMENT ON THE ROUND 3 SETTLEMENTS?	16

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23. WHAT IS THE DIFFERENCE BETWEEN EXCLUDING MYSELF FROM THE SETTLEMENT CLASSES AND OBJECTING TO THE ROUND 3 SETTLEMENTS?	17
THE FINAL FAIRNESS HEARING.....	17
24. WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE ROUND 3 SETTLEMENTS?.....	17
25. DO I HAVE TO ATTEND THE HEARING?.....	18
26. MAY I SPEAK AT THE HEARING?	18
THE TRIALS	18
27. WHEN AND WHERE WILL THE TRIALS AGAINST THE NON-SETTLING DEFENDANTS TAKE PLACE?	18
28. WHAT ARE THE PLAINTIFFS ASKING FOR FROM THE NON-SETTLING DEFENDANTS?	18
29. WILL I GET MONEY AFTER THE TRIALS?	18
GET MORE INFORMATION	18
30. HOW DO I GET MORE INFORMATION?	18

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BASIC INFORMATION

1. WHY IS THERE A NOTICE?

This Notice is to inform you about the Round 3 Settlements reached in some of the pending cases that are included in this litigation, before the Court decides whether to finally approve these Settlements.

The Court in charge is the United States District Court for the Eastern District of Michigan. This litigation is known as *In re: Automotive Parts Antitrust Litigation*. Within this litigation there are several different lawsuits. The people who sued are called the “Plaintiffs.” The companies they sued are called the “Defendants.”

Previously, you may have received notice about the Round 1 Settlements and Round 2 Settlements that were reached with 11 and 12 Defendants, respectively. The Round 1 Settlements received final approval from the Court on May 11, 2016. The Round 2 Settlements received final approval from the Court on July 10, 2017.

Round 3 Settlements have been reached with 33 Defendants, so that is why there is another Notice. This Notice explains the lawsuits, proposed Round 3 Settlements, Plan of Allocation, and your legal rights, including the ability to file a claim to receive a payment (if eligible).

2. WHAT ARE THESE LAWSUITS ABOUT?

Each lawsuit claims that the Defendants in that lawsuit agreed to unlawfully raise the price of a certain kind of vehicle component part. (For example, one lawsuit is called *In re: Radiators*, and the affected product is radiators.) As a result of the alleged agreements by Defendants, consumers and businesses who purchased or leased qualifying new vehicles (not for resale) containing those parts or who indirectly purchased qualifying replacement parts (not for resale) from the Defendants may have paid more than they should have. Although the Round 3 Settling Defendants have agreed to settle, they do not agree that they engaged in any wrongdoing or are liable or owe any money or benefits to Plaintiffs. The Court has not yet decided who is right.

3. WHO ARE THE ROUND 3 SETTLING DEFENDANTS?

The Round 3 Settling Defendants are:

1. Aisan Industry Co., Ltd.; Franklin Precision Industry, Inc.; Aisan Corporation of America; and Hyundai Industrial Co., Ltd. (collectively, “Aisan”),
2. ALPHA Corporation and Alpha Technology Corporation (collectively, “ALPHA”),
3. Alps Electric Co., Ltd.; Alps Electric (North America), Inc.; and Alps Automotive Inc. (collectively, “Alps”),
4. Robert Bosch GmbH and Robert Bosch LLC (collectively, “Bosch”),
5. Bridgestone Corporation and Bridgestone APM Company (collectively, “Bridgestone”),
6. Calsonic Kansei Corporation and Calsonic Kansei North America, Inc. (collectively, “Calsonic”),
7. Chiyoda Manufacturing Corporation and Chiyoda USA Corporation (collectively, “Chiyoda”),
8. Continental Automotive Electronics LLC; Continental Automotive Korea Ltd; and Continental Automotive Systems, Inc. (collectively, “Continental”),
9. Diamond Electric Mfg. Co., Ltd. and Diamond Electric Mfg. Corporation (collectively, “Diamond Electric”),
10. Eberspächer Exhaust Technology GmbH & Co. KG and Eberspächer North America Inc. (collectively, “Eberspächer”),
11. Faurecia Abgastechnik GmbH; Faurecia Systèmes d’Échappement; Faurecia Emissions Control Technologies, USA, LLC; and Faurecia Emissions Control Systems, N.A. LLC f/k/a Faurecia Exhaust Systems, Inc. (collectively, “Faurecia”),
12. Hitachi Automotive Systems, Ltd. (“HIAMS”),
13. Hitachi Metals, Ltd.; Hitachi Cable America Inc.; and Hitachi Metals America, Ltd. (collectively, “Hitachi Metals”),
14. INOAC Corporation; INOAC Group North America, LLC; and INOAC USA Inc. (collectively, “INOAC”),
15. JTEKT Corporation; JTEKT Automotive North America, Inc.; and JTEKT North America Corp. (formerly d/b/a Koyo Corporation of U.S.A.) (collectively, “JTEKT”),
16. Kiekert AG and Kiekert U.S.A., Inc. (collectively, “Kiekert”),
17. Koito Manufacturing Co., Ltd. and North American Lighting, Inc. (collectively, “KOITO”),
18. MAHLE Behr GmbH & Co. KG and MAHLE Behr USA Inc. (collectively, “MAHLE Behr”),

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19. MITSUBA Corporation and American Mitsuba Corporation (collectively, “MITSUBA”),
20. Nachi-Fujikoshi Corp. and Nachi America Inc. (collectively, “Nachi”),
21. NGK Insulators, Ltd. and NGK Automotive Ceramics USA, Inc. (collectively, “NGK Insulators”),
22. NGK Spark Plug Co., Ltd. and NGK Spark Plugs (U.S.A.), Inc. (collectively, “NGK Spark Plugs”),
23. Nishikawa Rubber Company, Ltd. (“Nishikawa”),
24. NTN Corporation and NTN USA Corporation (collectively, “NTN”),
25. Sanden Automotive Components Corporation; Sanden Automotive Climate Systems Corporation; and Sanden International (U.S.A.) Inc. (collectively, “Sanden”),
26. SKF USA Inc. (“SKF”),
27. Stanley Electric Co., Ltd.; Stanley Electric U.S. Co., Inc.; and II Stanley Co., Inc. (collectively, “Stanley”);
28. Tenneco Inc.; Tenneco GmbH; and Tenneco Automotive Operating Co., Inc. (collectively, “Tenneco”),
29. Toyo Tire & Rubber Co. Ltd.; Toyo Tire North America OE Sales LLC; and Toyo Automotive Parts (U.S.A.), Inc. (collectively, “Toyo”),
30. Usui Kokusai Sangyo Kaisha, Ltd. and Usui International Corporation (collectively, “Usui”),
31. Valeo S.A. (“Valeo”),
32. Yamada Manufacturing Co. Ltd. and Yamada North America, Inc. (collectively, “Yamada”), and
33. Yamashita Rubber Co., Ltd. and YUSA Corporation (collectively, “YAMASHITA”).

4. HAVE THERE BEEN ANY OTHER SETTLEMENTS RELATED TO THIS LAWSUIT?

Yes. The following companies previously agreed to the Round 1 Settlements in the lawsuits:

1. Autoliv, Inc.; Autoliv ASP, Inc.; Autoliv B.V. & Co. KG; Autoliv Safety Technology, Inc.; and Autoliv Japan Ltd.,
2. Fujikura, Ltd. and Fujikura Automotive America LLC,
3. Hitachi Automotive Systems, Ltd.,¹
4. Kyungshin-Lear Sales and Engineering, LLC,
5. Lear Corporation,
6. Nippon Seiki Co., Ltd.; N.S. International, Ltd.; and New Sabina Industries, Inc.,
7. Panasonic Corporation and Panasonic Corporation of North America,
8. Sumitomo Electric Industries, Ltd.; Sumitomo Wiring Systems, Ltd.; Sumitomo Electric Wiring Systems, Inc. (incorporating K&S Wiring Systems, Inc.); and Sumitomo Wiring Systems (U.S.A.) Inc.,
9. T.RAD Co., Ltd. and T.RAD North America, Inc.,
10. TRW Deutschland Holding GmbH and TRW Automotive Holdings Corporation (now known as “ZF TRW Automotive Holdings Corp.”), and
11. Yazaki Corporation and Yazaki North America, Incorporated.

The following companies previously agreed to the Round 2 Settlements in the lawsuits:

1. Aisin Seiki Co., Ltd. and Aisin Automotive Casting, LLC (together, “Aisin Seiki”),
2. DENSO Corporation; DENSO International America, Inc.; DENSO International Korea Corporation; DENSO Korea Automotive Corporation; DENSO Automotive Deutschland GmbH; ASMO Co., Ltd.; ASMO North America, LLC; ASMO Greenville of North Carolina, Inc.; and ASMO Manufacturing, Inc. (collectively, “DENSO”),
3. Furukawa Electric Co., Ltd. and American Furukawa, Inc. (together, “Furukawa”),
4. G.S. Electech, Inc.; G.S. Wiring Systems Inc.; and G.S.W. Manufacturing, Inc. (collectively, “G.S. Electech”),
5. LEONI Wiring Systems, Inc. and Leonische Holding Inc. (together, “LEONI”),
6. Mitsubishi Electric Corporation; Mitsubishi Electric US Holdings, Inc.; and Mitsubishi Electric Automotive America, Inc. (collectively, “MELCO”),
7. NSK Ltd.; NSK Americas, Inc.; NSK Steering Systems Co., Ltd.; and NSK Steering Systems America, Inc. (collectively, “NSK”),
8. Omron Automotive Electronics Co. Ltd. (“Omron”),

¹ Previously, HIAMS settled lawsuits related to Alternators, Starters, Ignition Coils, Motor Generators, Inverters, Air Flow Meters, Fuel Injection Systems, Valve Timing Control Devices, and Electronic Throttle Bodies.

9. Schaeffler Group USA Inc. (“Schaeffler”),
10. Sumitomo Riko Co. Ltd. and DTR Industries, Inc. (together, “Sumitomo Riko”),
11. Tokai Rika Co., Ltd. and TRAM, Inc. d/b/a Tokai Rika U.S.A. Inc. (together, “Tokai Rika”), and
12. Valeo Japan Co., Ltd. on behalf of itself and Valeo Inc.; Valeo Electrical Systems, Inc.; and Valeo Climate Control Corp.

The Court has given final approval to the Round 1 Settlements. *See Order Granting Final Approval* (June 20, 2016) (available on the website, www.AutoPartsClass.com, under the “Court Documents” tab, in the “Final Approval” section).

The Court has also given final approval to the Round 2 Settlements after overruling objections from several persons claiming to be members of the Settlement Classes. *See Order Granting Final Approval to the Round 2 Settlements* (July 10, 2017) (available on the website, www.AutoPartsClass.com, under the “Court Documents” tab, in the “Final Approval” section). The Court also struck certain objections because they were not timely filed. *Id.* at 13-14. Two of those objectors have appealed, and their appeal is pending before the Sixth Circuit Court of Appeals.

More information about these Settlements is available at www.AutoPartsClass.com.

5. WHO ARE THE NON-SETTLING DEFENDANTS?

A list of all of the Defendants and the vehicle component parts they manufactured and sold is available at www.AutoPartsClass.com.

6. WHAT VEHICLE PARTS ARE INCLUDED?

The Round 3 Settlements generally include the vehicle component parts listed below. The specific definitions of the vehicle component parts are available in each Settlement Agreement. Each of those Settlement Agreements, and the related Complaints, are accessible on the website www.AutoPartsClass.com or can be obtained by calling 1-877-940-5043.

- **Access Mechanisms** are door and trunk handles, door keys and door locks, electrical steering column locks, and mechanical steering column locks.
- **Air Conditioning Systems** are systems that cool the interior environment of a vehicle and are part of a vehicle’s thermal system. Air Conditioning Systems, whether sold together or separately, include one or more of the following: automotive compressors, condensers, HVAC units (typically consisting of a blower motor, actuators, flaps, evaporator, heater core, and filter embedded in a plastic housing), control panels, sensors, and associated hoses and pipes.
- **Anti-Vibrational Rubber Parts** are comprised primarily of rubber and metal and are installed in suspension systems and engine mounts, as well as other parts of a vehicle, to reduce engine and road vibration.
- **Automatic Transmission Fluid Warmers** are devices located in the engine compartment of a vehicle that warm the automatic transmission fluid.
- **Automotive Bearings** are devices in a vehicle used to position, hold, and guide moving parts, as well as to reduce friction between moving and fixed parts. Automotive Bearings are located throughout a vehicle. Automotive Bearings include the following devices used in vehicles: ball bearings, tapered roller bearings, roller bearings, mounted bearings, and parts and components for ball and roller bearings.
- **Automotive Brake Hoses** are flexible hoses that carry brake fluid through the hydraulic brake system of an automobile.
- **Automotive Hoses** are flexible tubes used to convey liquid and air in vehicles. Automotive Hoses include low-pressure rubber hoses used in automobile engine compartments and plastic and resin tubes used in vehicle engine compartments and fuel tank modules.
- **Automotive Constant-Velocity-Joint Boot Products** are composed of rubber or plastic, and are used to cover the constant-velocity-joints of an automobile to protect the joints from contaminants.

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- **Automotive Lamps** include headlamps and rear combination lamps installed by automobile original equipment manufacturers. A headlamp is an Automotive Lamp installed in the front of an automobile, which consists of lights such as headlights, a clearance lamp, and turn signals. A rear combination lamp is an Automotive Lamp installed in the rear of an automobile, which consists of lights such as a backup lamp, stop lamp, tail lights, and turn signals.
- **Automotive Steel Tubes** are used in fuel distribution, braking, and other automotive systems. Automotive Steel Tubes are sometimes divided into two categories: chassis tubes and engine parts. Chassis tubes, such as brake and fuel tubes, tend to be located in the body of a vehicle. Engine parts, such as fuel injection rails, oil level tubes, and oil strainer tubes, are associated with the function of a vehicle's engine.
- **Automotive Wire Harness Systems** are the electrical distribution systems used to direct and control electronic components, wiring, and circuit boards in vehicles. Automotive Wire Harness Systems include the following parts: automotive wire harnesses, automotive electrical wiring, lead wire assemblies, cable bond, automotive wiring connectors, automotive wiring terminals, electronic control units, fuse boxes, relay boxes, junction blocks, power distributors, high voltage wiring, and speed sensor wire assemblies.
- **Body Sealings** are automotive body sealing parts. They are typically made of rubber and trim the doors, hoods, and compartments of vehicles. Body Sealings keep noise, debris, rainwater, and wind from entering the vehicle and control vehicle vibration. In some instances, they also serve as a design element. Body Sealings include body-side opening seals, door-side weather-stripping, glass-run channels, trunk lids, and other rubber sealings.
- **Ceramic Substrates** are uncoated ceramic monoliths with fine honeycomb structures that, after coating with a mix of metal and other chemicals, are incorporated into automotive catalytic converters.
- **Electric Powered Steering Assemblies** provide power to assist the driver to more easily steer the vehicle. Electric Powered Steering Assemblies link the steering wheel to the tires. Electric Powered Steering Assemblies include Pinion-Assist Type Electric Powered Steering Assemblies as well as all component parts of the assemblies, including the steering column, intermediate shaft, electronic control unit, and electric power steering motors (but not the steering wheel or tires).
- **Exhaust Systems** are systems of piping and other parts that convey noxious exhaust gases away from the passenger compartment and reduces the level of pollutants and engine exhaust noise emitted. An Exhaust System includes one or more of the following components: manifold, flex pipes, catalytic converter, oxygen sensor, isolator/gasket/clamps, resonator assemblies/pipe accessories, and muffler/muffler assemblies. An Exhaust System has a "hot end," which is the part of the Exhaust System that is mounted to the engine, which is generally comprised of a manifold and catalytic converter, and a "cold end," which is the part of the Exhaust System that is mounted to the underbody of the car, which generally contains a muffler, pipes, and possibly a catalytic converter.
- **Fan Motors** are small electric motors used to turn radiator cooling fans.
- **Fuel Injection Systems** admit fuel or a fuel/air mixture into vehicle engine cylinders. Fuel Injection Systems can also be sold as part of a broader system, such as an engine management system, or as separate components. Fuel Injection Systems include one or more of the following parts: injectors; high pressure pumps; rail assemblies; feed lines; engine electronic control units; fuel pumps and fuel pump modules; manifold absolute pressure sensors; pressure regulators; pulsation dampers; purge control valves; air flow meters; and electronic throttle bodies.
- **Heater Control Panels** are either mechanical or electrical devices that control the temperature of the interior environment of a vehicle. Heater Control Panels can be either manual (referred to as low-grade) or automatic (referred to as high-grade) and are located in the center console, back seat, or rear cabin of an automobile.

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- **High Intensity Discharge (“HID”) Ballasts** are electrical devices that limit the amount of electrical current flowing to a High Intensity Discharge Ballast headlamp.
- **Ignition Coils** release electric energy to ignite the fuel/air mixture in cylinders.
- **Instrument Panel Clusters** are the mounted instruments and gauges housed in front of the driver of a vehicle. Instrument Panel Clusters are also known as meters.
- **Interior Trim Products** are automotive plastic interior trim parts. They do not include the main bodies of instrument panels and typically consist of molded trim parts made from plastics, polymers, elastomers, and/or resins manufactured and/or sold for installation in automobile interiors, including console boxes, assist grips, registers, center cluster panels, glove boxes, and glove box doors, meter cluster hoods, switch hole covers, and lower panel covers and boxes.
- **Oil Coolers** are devices located in the engine compartment of a vehicle that remove surplus heat from the engine oil. (This part does not have its own separate lawsuit. Claims relating to Oil Coolers are brought in the *Automatic Transmission Fluid Warmers* case.)
- **Power Window Motors** are small electric motors used to raise and lower vehicle windows.
- **Power Window Switches** are switches that raise or lower a vehicle’s electric windows.
- **Radiators** are heat exchangers or other devices that help prevent vehicle engines from overheating or otherwise regulate the temperature of the engine compartment of a vehicle and the fluids passing through it, including all devices physically attached to and sold as part of a radiator.
- **Shock Absorbers** are part of the suspension system on automobiles. They absorb and dissipate energy to help cushion vehicles on uneven roads, leading to improved ride quality and vehicle handling. Shock Absorbers are also called “dampers.”
- **Side Door Latches** secure an automotive door to a vehicle body and may be locked to prevent unauthorized access to a vehicle. A “Latch Minimodule” includes the Side Door Latch and all of the related mechanical operating components, including the electric lock function.
- **Spark Plugs** are located in the engine and deliver high electric voltage from the ignition system to the combustion chamber of an internal combustion engine.
- **Starters** are devices that power a vehicle’s battery to “turn over” and start when the driver turns the ignition switch.
- **Windshield Washer Systems** include one or more of the following: pump, hoses, nozzle, and tank necessary to deliver washer fluid to vehicle windows.
- **Windshield Wiper Systems** include one or more of the following: motor, linkage, arm, and blade necessary to clear water or snow from vehicle windows.

7. WHY ARE THESE CLASS ACTIONS?

In class actions, one or more individuals or companies called the “class representatives” sue on behalf of themselves and other people with similar claims in the specific class action. All of these individuals or companies together are the “Class” or “Class members.” In these Class actions, there are more than fifty Class representatives. In a class action, one court may resolve the issues for all Class members, except for those who exclude themselves from the Class.

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WHO IS INCLUDED IN THE CLASSES**8. HOW DO I KNOW IF I MAY BE INCLUDED IN THE ROUND 3 SETTLEMENT CLASSES?**

Generally, you may be included in one or more of the Round 3 Settlement Classes if, at any time from 1995 to 2018, you: (1) bought or leased a qualifying new vehicle in the U.S. (not for resale), or (2) paid to replace one or more of the qualifying vehicle parts listed in Question 6 above (not for resale). In general, qualifying vehicles include four-wheeled passenger automobiles, cars, light trucks, pickup trucks, crossovers, vans, mini-vans, and sport utility vehicles.

The specific definition of the vehicles, as well as the definition of who is included in the Round 3 Settlement Classes, is set forth in each Settlement Agreement. Each of those Settlement Agreements, and the related Complaints, are accessible on the website www.AutoPartsClass.com or can be obtained by calling 1-877-940-5043.

You will also be able to obtain additional information to learn whether you are a member of one or more of the Round 1, Round 2, or Round 3 Settlement Classes by visiting the website www.AutoPartsClass.com and providing details regarding your purchase or lease of a new vehicle or your purchase of a replacement part or by calling 1-877-940-504.

A separate Settlement Class has been preliminarily approved by the Court in each of the following cases settled by the Round 3 Settling Defendants and their affiliates. The time period covered by the Round 3 Settlements for each of the Settlement Classes is provided below:

Defendant	Time Period Starts	Time Period Ends	Auto Part(s) Cases
Aisan	January 1, 2000	December 19, 2016	Fuel Injection Systems
ALPHA	January 1, 2002	January 11, 2018	Access Mechanisms
Alps	January 1, 2000	March 30, 2017	Heater Control Panels
Bosch	January 1, 2000	July 27, 2017	<ul style="list-style-type: none"> • Windshield Wiper Systems • Starters • Fuel Injection Systems • Spark Plugs
Bridgestone	March 1, 1996	September 25, 2017	Anti-Vibrational Rubber Parts
Calsonic	February 1, 2001	January 30, 2018	Radiators
	November 1, 2001	January 30, 2018	ATF Warmers and Oil Coolers
	May 1, 1999	January 30, 2018	Air Conditioning Systems
Chiyoda	January 1, 1999	January 4, 2017	Wire Harness Systems
Continental	January 1, 2001	January 18, 2018	Instrument Panel Clusters
Diamond Electric	January 1, 2000	June 8, 2017	Ignition Coils
Eberspächer	January 1, 2002	September 11, 2017	Exhaust Systems
Faurecia	January 1, 2002	November 15, 2017	Exhaust Systems
HIAMS	January 1, 1995	September 18, 2017	Shock Absorbers
Hitachi Metals	February 1, 2004	February 8, 2017	Automotive Brake Hoses

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Defendant	Time Period Starts	Time Period Ends	Auto Part(s) Cases
INOAC	June 1, 2004	January 30, 2017	Interior Trim Products
JTEKT	January 1, 2000	October 6, 2016	Automotive Bearings
	January 1, 2005	October 6, 2016	Electric Powered Steering Assemblies
Kiekert	January 1, 2004	September 22, 2017	Side Door Latches
KOITO	June 1, 1997	May 26, 2017	Automotive Lamps
	July 1, 1998	May 26, 2017	HID Ballasts
MAHLE Behr	May 1, 1999	December 11, 2017	Air Conditioning Systems
MITSUBA	January 1, 2000	August 9, 2017	Windshield Wiper Systems Starters Fan Motors Fuel Injection Systems Power Window Motors Windshield Washer Systems
	February 1, 2001	August 9, 2017	Radiators
	June 1, 1997	August 9, 2017	Automotive Lamps
	January 1, 2005	August 9, 2017	Electric Powered Steering Assemblies
Nachi	January 1, 2000	July 24, 2017	Automotive Bearings
NGK Insulators	July 1, 1999	October 16, 2017	Ceramic Substrates
NGK Spark Plugs	January 1, 2000	December 21, 2017	Spark Plugs
Nishikawa	January 1, 2000	November 15, 2017	Body Sealings
NTN	January 1, 2000	November 16, 2016	Automotive Bearings
Sanden	January 1, 2002	February 12, 2018	Access Mechanisms
SKF	January 1, 2000	May 8, 2017	Automotive Bearings
Stanley	June 1, 1997	March 8, 2018	Automotive Lamps
	July 1, 1998	March 8, 2018	HID Ballasts
Tenneco	January 1, 2002	February 13, 2018	Exhaust Systems
Toyo	March 1, 1996	September 14, 2017	Anti-Vibrational Rubber Part
	January 1, 2006	September 14, 2017	Automotive Constant-Velocity-Joint Boot Products

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Defendant	Time Period Starts	Time Period Ends	Auto Part(s) Cases
Usui	December 1, 2003	December 20, 2017	Automotive Steel Tubes
VALEO	January 1, 2002	January 5, 2018	Access Mechanisms
Yamada	January 1, 2005	November 28, 2016	Electric Powered Steering Assemblies
YAMASHITA	March 1, 1996	September 27, 2016	Anti-Vibrational Rubber Parts

Payments to members of the Settlement Classes only will be made if the Court approves the Round 3 Settlements and after any appeals from such approval are resolved and in accordance with the Plan of Allocation to distribute the Net Settlement Funds (*see Question 14*).

These cases are proceeding as class actions seeking monetary recovery for consumers and businesses in 30 states and the District of Columbia and for nationwide injunctive relief to stop the Defendants' alleged illegal behavior and prevent this behavior from happening in the future (*see Question 15*).

Purchasers or lessees of qualifying new vehicles or indirect purchasers of any of the replacement parts listed in Question 6 may be members of the Settlement Classes entitled to monetary recovery. Only those members of the Settlement Classes who, during the relevant time periods listed above, purchased or leased a vehicle or purchased a replacement part while (1) residing or (2) as to businesses, having the principal place of business located, in the District of Columbia or the states listed below will be entitled to share in the monetary recovery. Those states are: Arizona, Arkansas, California, Florida, Hawaii, Iowa, Kansas, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Oregon, Rhode Island, South Carolina, South Dakota, Tennessee, Utah, Vermont, West Virginia, and Wisconsin. You may have seen a prior notice that indicated that members of the Settlement Classes may be entitled to monetary recovery if the purchase or lease transaction occurred in the District of Columbia or one of the listed states. Please note that the prior information as to the place of the purchase or lease transaction is superseded by this notice.

9. WHO IS NOT INCLUDED IN THE SETTLEMENT CLASSES?

The Settlement Classes do not include:

- Any of the Defendants, their parent companies, subsidiaries, and affiliates;
- Any co-conspirators;
- Federal government entities and instrumentalities;
- States and their political subdivisions, agencies, and instrumentalities; and
- All persons who purchased their vehicle parts directly from the Defendants or for resale.

10. WHY ARE THE LAWSUITS CONTINUING IF THERE ARE SETTLEMENTS?

The Round 3 Settlements have been reached with the Round 3 Settling Defendants (listed in Question 3) as specified in the individual Settlement Agreements. The lawsuits will continue against the remaining Defendants who have not settled ("Non-Settling Defendants").

Additional money may become available in the future as a result of a trial or future Settlements. Alternatively, the litigation may be resolved in favor of the Non-Settling Defendants, and no additional money may become available. There is no guarantee as to what will happen.

Please visit the website, www.AutoPartsClass.com, and register to be notified about any future Settlements or to file a claim.

THE ROUND 3 SETTLEMENTS' BENEFITS**11. WHAT DO THE ROUND 3 SETTLEMENTS PROVIDE?**

The Round 3 Settlements totaling \$432,823,040 are now being presented to the Court for approval. The Court has already approved the Round 1 Settlements, totaling \$224,668,350 in 19 cases and the Round 2 Settlements, totaling \$379,401,268 in 27 cases. Together, the Round 1 through 3 Settlement Funds total approximately \$1.04 billion. After deduction of attorneys' fees, notice and claims administration costs, and litigation expenses, as approved by the Court, the Net Settlement Funds will be available for distribution to members of the Settlement Classes who timely file valid claims.

The Round 3 Settlements also include non-monetary relief (*see Question 15*), including cooperation, as well as, with the exception of Eberspächer, Hitachi Metals, MAHLE Behr, NGK Spark Plugs, and NTN, agreements by these Settling Defendants not to engage in the conduct that is the subject of the lawsuits, as more fully described in the proposed Final Judgments located on the Settlement website www.AutoPartsClass.com.

The Settlement Funds are allocated to the relevant vehicle component cases as follows:

Auto Parts Round 3 Settlements and Settlement Funds		
Automotive Parts Case	Round 3 Settling Defendant	Settlement Fund
Access Mechanisms	ALPHA	\$2,698,000
	Valeo	\$760,000
Air Conditioning Systems	MAHLE Behr	\$1,482,000
	Calsonic	\$5,153,860
	Sanden	\$7,600,000
Anti-Vibrational Rubber Parts	Bridgestone	\$29,640,000
	Toyo	\$34,343,309
	Yamashita	\$6,080,000
Automatic Transmission Fluid Warmers	Calsonic	\$380,366
Automotive Bearings	JTEKT	\$43,418,819
	Nachi	\$3,230,000
	NTN	\$6,574,000
	SKF	\$7,600,000
Automotive Brake Hoses	Hitachi Metals	\$1,140,000
Automotive Constant-Velocity-Joint Boot Products	Toyo	\$1,756,691
Automotive Lamps	Koito	\$21,654,653
	MITSUBA	\$241,876
	Stanley	\$12,316,880
Automotive Steel Tubes	Usui	\$5,320,000
Body Sealings	Nishikawa	\$37,620,000
Ceramic Substrates	NGK Insulators	\$12,160,000
Electric Powered Steering Assemblies	JTEKT	\$4,081,181
	MITSUBA	\$169,313

Questions? Call 1-877-940-5043 or Visit www.AutoPartsClass.com

Auto Parts Round 3 Settlements and Settlement Funds

Automotive Parts Case	Round 3 Settling Defendant	Settlement Fund
	Yamada	\$2,356,000
Exhaust Systems	Eberspächer	\$1,368,000
	Faurecia	\$1,482,000
	Tenneco	\$17,480,000
Fan Motors	MITSUBA	\$3,664,422
Fuel Injection Systems	Aisan	\$4,560,000
	Bosch	\$2,892,560
	MITSUBA	\$1,378,693
Heater Control Panels	Alps	\$3,230,000
HID Ballasts	Koito	\$1,335,346
	Stanley	\$2,883,120
Ignition Coils	Diamond Electric	\$5,396,000
Instrument Panel Clusters	Continental	\$3,800,000
Interior Trim Products	INOAC	\$2,470,000
Power Window Motors	MITSUBA	\$19,180,770
Radiators	MITSUBA	\$3,664,422
	Calsonic	\$5,587,612
Shock Absorbers	HIAMS	\$13,300,000
Side Door Latches	Kiekert	\$2,280,000
Spark Plugs	Bosch	\$28,999,168
	NGK Spark Plugs	\$12,730,000
Starters	Bosch	\$1,039,984
	MITSUBA	\$9,457,353
Windshield Washer Systems	MITSUBA	\$1,548,006
Windshield Wiper Systems	Bosch	\$508,288
	MITSUBA	\$32,895,142
Wire Harness	Chiyoda	\$1,915,200
Total		\$432,823,040

Any interest earned will be added to each of the Settlement Funds. More details about the Round 3 Settlements are provided in the Round 3 Settlement Agreements, available at www.AutoPartsClass.com.

HOW TO GET BENEFITS

12. HOW DO I SUBMIT A CLAIM?

You may be entitled to a portion of the Settlement Funds when a distribution is made to members of the Settlement Classes. If you excluded or exclude yourself from any of the Settlement Classes in the Round 1 through Round 3 Settlements, you will not receive a payment from those funds.

However, you will be required to submit a Claim Form to be eligible to receive a payment from any of the Settlement Funds. No deadline has been set yet by the Court for the submission of claims, but you can file your claim now. Claims may be submitted online at www.AutoPartsClass.com or by printing and mailing your completed form to:

Auto Parts Claims Administrator
P.O. Box 10163
Dublin, OH 43017-3163

You may also call 1-877-940-5043, write the Claims Administrator at the address above, or visit www.AutoPartsClass.com to obtain a Claim Form.

If you submit a Claim Form or register at the Settlement website, you will receive future notifications containing additional important information, including information about any future Settlements.

13. HOW MUCH MONEY CAN I GET?

The amount of your recovery will be determined by the Plan of Allocation, the terms of which are posted on the website www.AutoPartsClass.com.

The Court previously approved a Plan of Allocation to distribute the Net Settlement Funds from the Round 1 and Round 2 Settlements to the members of those Settlement Classes. Settlement Class Counsel have proposed that the Court approve the same Plan of Allocation to apply to the Round 3 Settlements.

According to the proposed Plan of Allocation, Payments will be distributed proportionally (or made on a *pro rata* basis) to members of the Settlement Classes who submit claims that are allowed by the Court. The payment amount will be based on a ratio consisting of the claimant's total number of vehicles purchased or leased or replacement parts purchased, and the total number of vehicles purchased or leased and replacement parts purchased by other claimants. Claims based on vehicles containing automotive parts that were allegedly specifically targeted by Defendants' alleged collusive conduct may receive more money. The amount of money members of the Settlement Classes are eligible to receive is based on information obtained by Class Counsel during discovery as well as the cooperation provided by the Settling Defendants from each Round.

At this time, it is unknown how much each member of the Settlement Classes who submits a valid claim will receive. Payments will be based on a number of factors, including at least the number of valid claims filed by all members of the Settlement Class and the number of (1) qualifying new vehicles purchased or leased or (2) qualifying replacement parts purchased. It is possible that any money remaining after claims are paid will be distributed to charities, governmental entities, or other beneficiaries approved by the Court. No matter how many claims are filed, no money will be returned to the Settling Defendants after the Court finally approves the Round 3 Settlements.

In order to receive a payment from any of the Settlements (Round 1 through Round 3), you will need to file a valid Claim Form. If you want to be kept updated about any future settlements, you should register at www.AutoPartsClass.com or file a Claim Form. If you already submitted a Claim Form, you do not need to file another claim for that specific vehicle or replacement part. However, if you purchased additional vehicles or replacement parts, which were not mentioned in your previous Claim Form, you should file a new Claim Form for the additional vehicles or replacement parts.

14. WHEN WILL I GET A PAYMENT?

Payments may be distributed to members of the Settlement Classes after the Court grants final approval to the Round 3 Settlements and any appeals from such approvals are resolved. Appeals can take several years to conclude.

15. WHAT IS THE NON-MONETARY RELIEF?

With the exception of Eberspächer, Hitachi Metals, MAHLE Behr, NGK Spark Plugs, and NTN, the Round 3 Settling Defendants have agreed not to engage in certain specified conduct that would violate the antitrust laws that are at issue in these lawsuits for a period of two years. Additionally, all of the Round 3 Settling Defendants will cooperate with the Plaintiffs in their ongoing litigation against the Non-Settling Defendants.

REMAINING IN THE CLASSES

16. WHAT HAPPENS IF I REMAIN IN THE SETTLEMENT CLASSES?

If the Round 3 Settlements become final, you will give up your right to sue these Settling Defendants on your own for the claims described in the Settlement Agreements unless you exclude yourself from one or more of the Settlement Classes. You also will be bound by any decisions by the Court relating to any Round 3 Settlements from which you do not exclude yourself.

In return for paying the Settlement amounts and providing the non-monetary benefits, the Round 3 Settling Defendants (and certain related entities defined in the Settlement Agreements) will be released from claims relating to the alleged conduct involving the vehicle parts identified in the Settlement Agreements. The Round 3 Settlement Agreements describe the released claims in detail, so read them carefully since those releases will be binding on you if the Court approves these Settlements. If you have any questions, you can talk to Class Counsel listed in Question 20 for free, or you can, of course, talk to your own lawyer (at your own expense). The Round 3 Settlement Agreements and the specific releases are available at www.AutoPartsClass.com.

EXCLUDING YOURSELF FROM THE SETTLEMENT CLASSES

17. HOW DO I GET OUT OF THE SETTLEMENT CLASSES?

To exclude yourself from one or more of the Settlement Classes, you must send a letter by mail stating that you want to be excluded from *In re Automotive Parts Antitrust Litigation*, and specifying which Settlement Class or Classes (including the specific automotive part case) you wish to be excluded from. If you did not timely request to be excluded from the Round 1 or Round 2 Settlement Classes, you may not request to be excluded from those Settlement Classes at this time. You may only request to be excluded from the Settlement Classes for the Round 3 Settlements.

Your letter must also include:

- Your name, address, and telephone number;
- Documents reflecting your purchase or lease of a new eligible vehicle and/or purchase of the applicable replacement part. Purchase or lease documentation should include: (a) the date of purchase or lease, (b) the make and model year of the new vehicle, and (c) the state where the new vehicle was purchased or leased. Replacement part documentation should include: (a) the date of purchase, (b) type of replacement part purchased, and (c) the state where the replacement part was purchased; and
- Your signature.

If you are seeking to exclude yourself from one or more of the Round 3 Settlement Classes, you are also requested (but not required) to state in your letter the number of new vehicles you purchased from January 1, 1995 to February 15, 2018.

Any request for exclusion must be mailed to the address immediately below, and must be **received** no later than **July 13, 2018**:

Automotive Parts Indirect Exclusions
P.O. Box 10163
Dublin, OH 43017-3163

18. IF I DON'T EXCLUDE MYSELF, CAN I SUE FOR THE SAME THING LATER?

No. Unless you exclude yourself, you give up any right to sue the Round 3 Settling Defendants for the claims being released in this litigation.

Questions? Call 1-877-940-5043 or Visit www.AutoPartsClass.com

19. IF I EXCLUDE MYSELF, CAN I STILL GET MONEY BENEFITS?

No. If you exclude yourself from the Settlement Classes in any of the Round 3 Settlements, you will not get any money as a result of the Settlement in that case. However, you may exclude yourself from one or more of the Settlement Classes for any of the Round 3 Settlements, but remain in the Settlement Classes for other Round 3 Settlements. In that case, you may receive money from the Round 3 Settlements for the Settlement Classes in which you remain a Class member.

THE LAWYERS REPRESENTING YOU

20. DO I HAVE A LAWYER REPRESENTING ME?

The Court has appointed the following law firms as Settlement Class Counsel to represent you and all other members of the Classes:

Adam Zapala Cotchett, Pitre, & McCarthy LLP San Francisco Airport Office Center 840 Malcolm Road, Suite 200 Burlingame, CA 94010	Hollis Salzman Robins Kaplan LLP 399 Park Avenue Suite 3600 New York, NY 10022	Marc M. Seltzer Susman Godfrey L.L.P. 1900 Avenue of the Stars Suite 1400 Los Angeles, CA 90067
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You will not be charged for contacting these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

21. HOW WILL THE LAWYERS BE PAID?

At the upcoming final fairness hearing, Class Counsel may ask the Court (a) to reimburse them for certain costs and expenses, and (b) for attorneys' fees based on their services in this litigation, not to exceed 25% of the approximately \$432,823,040 in additional Settlement Funds resulting from the Round 3 Settlements after deducting reimbursable litigation costs and expenses. Any payment to the attorneys will be subject to Court approval, and the Court may award less than the requested amount. The attorneys' fees, costs, and litigation expenses that the Court orders, plus the costs to administer the Round 3 Settlements, will come out of the Settlement Funds. Class Counsel may seek additional attorneys' fees, costs, and expenses from any additional Settlements or recoveries obtained in the future.

When Class Counsel's motion for fees, costs and expenses is filed, it will be available at www.AutoPartsClass.com. The motion will be posted on the website at least 45 days before the Court holds a hearing to consider the request, and at least 28 days before the deadline for any objections to or comments on the motion, from members of the Settlement Classes, to be received (*see* Question 22).

Register at the website or call 1-877-940-5043 to receive notice when the motion is filed.

OBJECTING TO THE ROUND 3 SETTLEMENTS

22. HOW DO I OBJECT TO OR COMMENT ON THE ROUND 3 SETTLEMENTS?

If you have objections to or comments about any aspect of (a) one or more of the Round 3 Settlements, (b) the Plan of Allocation as it applies to members of the Round 3 Settlement Classes, or (c) the motion by Class Counsel for attorneys' fees as it applies to members of the Round 3 Settlement Classes, then you may express your views to the Court. You can only object to or comment on these matters if you do not exclude yourself from the applicable Settlement Class or Classes.

To object to or comment on a Round 3 Settlement, the Plan of Allocation, or the motion for attorneys' fees, you must do so in writing. Your letter must specify which Settlement (including the specific vehicle part) you are objecting to and include the following in your objection letter:

- Your name, address, and telephone number;
- Documents reflecting your purchase or lease of a new eligible vehicle and/or purchase of the applicable replacement part. Purchase or lease documentation should include: (a) the date of purchase or lease, (b) the

Questions? Call 1-877-940-5043 or Visit www.AutoPartsClass.com

make and model year of the new vehicle, and (c) the state where the new vehicle was purchased or leased. Replacement part documentation should include: (a) the date of purchase, (b) type of replacement part purchased, and (c) the state where the replacement part was purchased;

- The name of the Settling Defendant whose Settlement you are objecting to or commenting on;
- The vehicle part case, including the case name and case number, that is the subject of your objection(s) or comments. (You can find the case numbers on the website, www.AutoPartsClass.com. Go to the “Class Action Complaints” under the “Court Documents” tab to find the cases by part.);
- The reasons you object to the Settlement, Plan of Allocation, or motion for attorneys’ fees, along with any supporting materials; and
- Your signature.

Any comment or objection must be in writing, mailed to **both** of the addresses listed immediately below, and must be received by both the Clerk of the Court and the Notice Administrator, no later than **July 13, 2018**. The addresses are:

Court	Notice Administrator
U.S. District Court for the Eastern District of Michigan Clerk of the Court Theodore Levin U.S. Courthouse 231 W. Lafayette Blvd., Room 564 Detroit, MI 48226	Auto Parts Settlements Objections P.O. Box 10163 Dublin, OH 43017-3163

Any objection or comment must also be timely filed with the Court (i.e., on or before July 13, 2018) in the case file (or docket) of the specific automotive parts case or cases that are the subject of your objection or comments. Objections or comments filed only in *In re Automotive Parts Antitrust Litigation* (the Master Docket, 2:12-md-02311), will not satisfy this requirement.

You will not have an opportunity to speak at the Court’s Fairness Hearing (*see* Question 24) unless you first submit a complete, valid, and timely written objection.

23. WHAT IS THE DIFFERENCE BETWEEN EXCLUDING MYSELF FROM THE SETTLEMENT CLASSES AND OBJECTING TO THE ROUND 3 SETTLEMENTS?

If you exclude yourself from one or more of the Round 3 Settlement Classes, you are telling the Court that you do not want to participate in the Round 3 Settlement(s) from which you exclude yourself. Therefore, you will not be eligible to receive any payment from those Round 3 Settlement(s), and you will not be able to object to them. Objecting to a Round 3 Settlement simply means telling the Court that you do not like something about the Settlement. Objecting does not make you ineligible to receive a payment.

THE FINAL FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the Round 3 Settlements and any requests by Settlement Class Counsel for fees, costs, expenses, and class representative awards. You may attend and you may ask to speak, but you do not have to do so.

24. WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE ROUND 3 SETTLEMENTS?

The Court will hold a Final Fairness Hearing at 10:00 a.m. on **August 1, 2018**, at the United States Courthouse, 231 W. Lafayette Blvd, Detroit, MI 48226, Room 272. The hearing may be moved to a different date or time without additional notice, so check www.AutoPartsClass.com or call 1-877-940-5043 for current information. At this hearing, the Court will consider whether the Round 3 Settlements and the Plan of Allocation are fair, reasonable, and adequate. If there are objections or comments, the Court will consider them at that time and may listen to people who have asked to speak at the hearing. The Court may also decide how much to pay Settlement Class Counsel. At or after the hearing, the Court will decide whether to approve the Round 3 Settlements.

25. DO I HAVE TO ATTEND THE HEARING?

No. Class Counsel will answer any questions the Court may have. But you are welcome to attend at your expense. If you send an objection or comment, you do not have to come to Court to talk about it. As long as you mailed your complete and valid written objection on time, as described above in Question 22, the Court will consider it. You may also hire your own lawyer at your own expense to attend on your behalf, but you are not required to do so.

26. MAY I SPEAK AT THE HEARING?

If you send an objection or comment on the Round 3 Settlements, Plan of Allocation, or motion for attorney's fees, as described in Question 22, you may have the right to speak at the Final Fairness Hearing as determined by the Court. You cannot speak at the hearing if you do not submit a timely written objection or comment as described in Question 22. You cannot speak at the hearing if you exclude yourself from that specific Settlement Class.

THE TRIALS

27. WHEN AND WHERE WILL THE TRIALS AGAINST THE NON-SETTLING DEFENDANTS TAKE PLACE?

If the cases are not dismissed or settled, the Plaintiffs will have to prove their claims against the Non-Settling Defendants at trial. Trial dates and locations have not yet been set.

At the trial, a decision will be reached about whether the Plaintiffs or the Non-Settling Defendants are right about the claims in the lawsuits. There is no guarantee that the Plaintiffs will win any money or other benefits for members of the Classes at trial.

28. WHAT ARE THE PLAINTIFFS ASKING FOR FROM THE NON-SETTLING DEFENDANTS?

The Class representatives are asking for money for members of the Settlement Classes in the District of Columbia and 30 states listed in Question 8 above. The Class representatives are also seeking a nationwide court order to prohibit the Non-Settling Defendants from engaging in the alleged behavior that is the subject of the lawsuits.

29. WILL I GET MONEY AFTER THE TRIALS?

If the Plaintiffs obtain money or benefits as a result of a trial or Settlement with any of the Non-Settling Defendants, then members of the Settlement Classes will be notified about how to ask for a share or what their other options are at that time. That information will be available on the website: www.AutoPartsClass.com. These things are not known right now.

GET MORE INFORMATION

30. HOW DO I GET MORE INFORMATION?

This Notice summarizes the Round 3 Settlements. More details are in the Round 3 Settlement Agreements. You can get copies of the Settlement Agreements and more information about all the Settlements at www.AutoPartsClass.com. In addition, the full Plan of Allocation is available on the website, www.AutoPartsClass.com. You also may write with questions to Auto Parts Settlements, P.O. Box 10163, Dublin, OH 43017-3163 or call the toll-free number, 1-877-940-5043. You should also register at the website to be directly notified of any future settlements, how to file a Claim Form, and other information concerning these cases.